

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:15-CR-151-O

KARLEE WILCOX (24)

FACTUAL RESUME

SUPERSEDING Count One: Conspiracy to Possess a Controlled Substance with
INFORMATION: intent to Distribute (methamphetamine)
(in violation of 21 U.S.C. §§ 846; 841(a)(1) and (b)(1)(C))

PENALTY: \$1,000,000 fine - not more than 20 years imprisonment, or both such fine
and imprisonment, plus a term of supervised release of not less than 3
years.

MAXIMUM PENALTY:

\$1,000,000 fine and not more than twenty (20) years imprisonment, plus a
term of supervised release of not less than 3 years. If the defendant violates
any condition of supervised release, the Court may revoke such term of
supervised release and require the defendant to serve an additional period of
confinement. Further the Court must impose a Mandatory Special
Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to
establish the offenses charged in Count One of the Superseding Information are as
follows:

First: That two or more persons, directly or indirectly, reached an agreement to
distribute or possess with intent to distribute a controlled substance, as
charged in the indictment;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

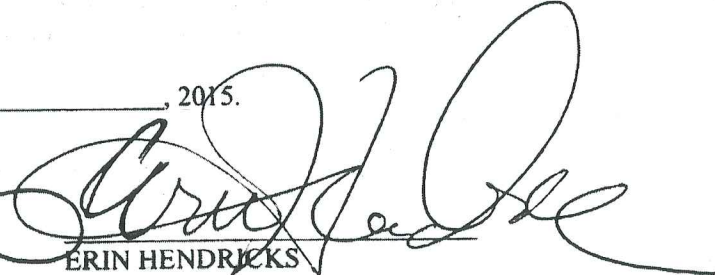
Fourth: That the overall scope of the conspiracy involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

Since approximately 2014, Karlee Wilcox received ounce quantities of methamphetamine from Chris Turner and Damon Lee, and others. In turn, Karlee Wilcox distributed methamphetamine to various customers in the Fort Worth and North Richland Hills, Texas areas, returning to Chris Turner and Damon Lee, or others for additional methamphetamine. In this manner, Karlee Wilcox, Chris Turner, and Damon Lee conspired with each other and others to possess with intent to distribute methamphetamine.

SIGNED this 10 day of JULY, 2015.


KARLEE WILCOX
Defendant


ERIN HENDRICKS
Counsel for Defendant